



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 8, 2016

Honorable Kenneth M. Karas
United States District Court Judge
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

**Re: United States v. Constance G. Post & Wayne Charles
08 Cr. 243(KMK)**

Dear Judge Karas:

We write to respectfully request an extension of time, until February 19, 2016, to file the Government's response to the defendants' post-trial motions. The defendants' motions were filed on January 13 and 14, 2016, respectively.

As reflected in Mr. Tanner's letter dated December 4, 2015, the parties agreed that defense motions would be submitted by January 7, 2016 and that the Government's response would be filed three weeks later. Counsel for the defendants subsequently requested a one-week extension until January 14, 2016. Because of my participation in the preparation of a case for trial before the Honorable Shira A. Sheindlin, that was scheduled to commence on February 1, 2016, (but which has now been adjourned), we respectfully request additional time to prepare our response. Mr. Tanner and Mr. Lewis have no objection to this request.

We thank the Court for its consideration of this matter.

Very truly yours,

PREET BHARARA
United States Attorney

by: s/Andrew S. Dember
Andrew S. Dember
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cc: Stephen R. Lewis, Esq. (By ECF)
Howard E. Tanner, Esq. (By ECF)